VRSCA™
Video Relay Services Consumer Association
www.vrsca.org

April 27, 2015

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Communication
CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

The Video Relay Services Consumer Association (VRSCA) respectfully submits this ex parte letter in support of the Joint Proposal of All Six VRS Providers for Improving Functional Equivalence and Stabilizing Rates (Joint Proposal) filed on March 30, 2015, with the Federal Communications Commission (FCC) in CG Docket Nos. 03-123 and 10-51. The six VRS providers include ASL Services Holdings, LLC, Convo Communications, LLC, CSDVRS, LLC, Hancock Jahn Lee & Puckett, LLC (CAAG), Purple Communications Inc., and Sorenson Communications, Inc. (VRS Providers).

The VRSCA, a national communication forum for deaf, hard-of-hearing, deaf-blind, speech-disabled, and hearing individuals who communicate using American Sign Language (ASL) and Video Relay Service (VRS), has previously filed comments in this proceeding expressing the concerns of many VRS consumers with respect to the FCC's efforts to ensure that the provision of VRS is functionally equivalent to conventional telecommunication services. Our association is continually seeking improvements in the service levels for VRS. In addition to filing comments with the FCC and providing an objective environment for individuals to be informed about issues related to VRS, the VRSCA participates at deaf expositions, town hall meetings, and other events throughout the U.S. and conducts surveys covering VRS issues that are important to consumers. Most recently, the VRSCA conducted surveys at national deaf events in Orlando, Florida, Austin, Texas, and Atlanta, Georgia, the results of which are summarized in the Appendix attached to this letter. In the opinion of many VRS consumers that recently participated in the survey, there has not been much improvement in the service levels for VRS and some consumers have indicated they noticed declines in service levels. The VRSCA is concerned about any further degradation in the quality of service in VRS.

Over the years, the VRSCA has not endorsed any individual VRS provider's programs or ideas. The VRSCA has remained neutral and has put the consumers' needs first, offering leadership on efforts that benefit VRS consumers.

The VRSCA is extremely pleased to see the Joint Proposal. Every one of the six VRS Providers came together with their unanimous request for improving the quality of VRS and stabilizing VRS rates. The VRSCA is endorsing this Joint Proposal because it came from all of the VRS Providers and, most importantly, the VRSCA recognizes the benefits for consumers.

The VRSCA has reviewed the recent letter of support for the Joint Proposal filed by nine Deaf consumer organizations. The VRSCA adds its support to the Joint Proposal. Specifically, the VRSCA is supportive of the following proposals by the VRS Providers:

1 Improve the speed-of-answer performance;
2 Conduct a trial to introduce skills-based routing for calls where additional training and qualifications are needed – for example, during medical calls;
3 Encourage VRS providers to offer Certified Deaf Interpreters (CDIs) for consumers who are not fluent in ASL; and
4 Improve interoperability.

The results of recent surveys conducted by the VRSCA at multiple national deaf events confirm that deaf consumers overwhelming agree that implementing these four proposals will improve the quality of VRS. The survey questions were developed based on seven improvements in service levels for VRS. Four of the seven questions were in line with the improvements proposed by the VRS Providers and the VRSCA survey respondents were very supportive of these four improvements, as discussed below.

1. Improve Speed-of-Answer.

In the Joint Proposal, the VRS Providers propose that 80% of all VRS calls should be answered within 45 seconds, measured monthly. The VRSCA overwhelmingly supports this proposal because this would be a marked improvement in the speed-of-answer. According to the survey results, improving speed-of-answer is very important to VRS consumers. When asked what impact reducing the current 120 seconds required speed-of-answer to 60 seconds would have on consumers' experience with VRS, 85% of the respondents stated that this improved speed-of-answer would have a moderate to strong impact on their VRS experience. The VRSCA believes that the VRS Providers' request that the speed-of-answer be measured monthly is reasonable. An all-or-nothing penalty may cause some VRS providers to discontinue service, like IP Relay services, and VRS consumers do not want VRS providers to leave the market. VRS consumers want to maintain a competitive environment (of at least six providers), which means consumers benefit by having more choices and better service offerings.

2. Introduce skills-based routing.

The VRS Providers propose that the FCC conduct an eight-month trial during which providers may offer skills-based routing, and that the FCC exclude skills-based routed calls from calculating the speed-of-answer requirement during the trial period. Letters in support of the Joint Proposal were filed on April 7, 2015, by the Registry of Interpreters for the Deaf, Inc. (RID) and the Consumer Groups.[1] RID and the Consumer Groups support skills-based routing in VRS in order to connect VRS consumers with interpreters who are best able to meet the needs of the consumer or interpreters who have experience with specialty language or subject areas to help ensure that the needs of the consumer are accommodated. RID cites the NAD-RID Code of Professional Conduct, which requires interpreters to "accept assignments using discretion with regard to skill, communication mode, setting, and consumer needs," and explains that this requirement in the NAD-RID Code would be made more feasible with skills-based routing. RID and the Consumer Groups emphasize that skills-based routing is a necessary component of VRS that will support the FCC in fulfilling its mandate of functional equivalency. The Consumer Groups explain that skills-based routing could allow VRS consumers to select their interpreter according to skill set, specialized communication needs, and areas of knowledge or expertise. The VRSCA agrees with RID and the Consumer Groups, and strongly supports skills-based routing because better matching of the interpreters and VRS consumers during VRS calls will improve functional equivalency. From the VRSCA survey results, it is clear that VRS consumers overwhelmingly support skills-based routing in VRS. Almost 97% of the respondents stated that skills-based routing would have a moderate to strong impact on VRS calls.

3. Encourage VRS providers to offer Certified Deaf Interpreters.

The Joint Proposal states that the FCC should encourage but not require VRS providers to offer the assistance of qualified deaf interpreters during a VRS call. Deaf interpreters are very important to successful communications in many cases because they benefit deaf consumers and hearing consumers. The Consumer Groups, in their April 7, 2015 filing, explain that some VRS consumers have limited ASL skills or other disabilities that make communicating with the interpreter difficult, and adding a deaf interpreter will bring such VRS communications closer to functional equivalency. The VRSCA is in agreement with the Consumer Groups, that the addition of a deaf interpreter in such cases will bring such communications closer to functional equivalency. As further

[1] The following organizations comprise the Consumer Groups: Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, Hearing Loss Association of America, Association of Late Deafened Adults, Inc., American Association of the Deaf-Blind, Cerebral Palsy and Deaf Organization, Deaf Seniors of America, and California Coalition of Agencies Serving the Deaf and Hard of Hearing.

evidence of the benefits, almost 95% of the respondents in the VRSCA survey stated that deaf interpreters assisting with complicated VRS calls would have a moderate to strong impact on the VRS experience.

4. Improve interoperability.

With regard to interoperability, the VRSCA has gone on the record several times in support of improving interoperability. *See* VRSCA Comments filed in CG Docket Nos. 03-123 and 10-51 on March 9, 2012, Nov. 29, 2012, May 7, 2013, and Sept. 18, 2013. The VRSCA survey indicates that VRS consumers are very supportive of the efforts of VRS providers to improve interoperability for point-to-point videophone calls. When asked what impact solving interoperability problems between various VRS providers' equipment would have, meaning that consumers could call anyone regardless of their provider, more than 97% of the respondents stated that improved point-to-point interoperability would have a moderate to strong impact. Consumers with different mobile devices and different service providers should be able to call relatives, friends, co-workers, and others regardless of their provider and their phone, and this applies to all point-to-point calls. The result is improved functional equivalency in that a deaf, hard-of-hearing, or speech disabled consumer may choose their provider and call anyone with their phone similar to a hearing consumer, such as a hearing person calling from an iPhone using Sprint as their provider to another hearing person with a Samsung phone using Verizon as their provider. The VRSCA is supportive of a collaborative effort to improve interoperability and the VRS Providers are working with the FCC's Disability Advisory Committee (DAC) to resolve any remaining interoperability issues.

Conclusion

All six VRS Providers indicate that the improvements discussed above are conditioned upon the FCC stabilizing VRS rates. Consumers deserve to see improvements in VRS functional equivalency, rather than the lack of progress experienced in recent years. The VRSCA is hopeful that the FCC will provide the rate stabilization needed to make these service improvements in VRS a reality.

The VRSCA adds its enthusiastic endorsement to the VRS Providers' united Joint Proposal, and urges the FCC to adopt the Joint Proposal. It includes significant improvements toward achieving functional equivalence of VRS, consistent with the mandates of the Americans with Disabilities Act (ADA) that, among other things, guarantees access to telecommunication services for an individual who has a hearing or speech impairment in a manner that is functionally equivalent to the ability of a hearing individual. VRS is the most important telecommunication service for deaf, hard-of-hearing, deaf-blind, and speech disabled individuals, and the ADA clearly specifies that the needs of these individuals be considered first. We have waited long enough to have 100% functionally equivalent access to telecommunication services, and this Joint

Proposal is a significant step forward. The VRSCA applauds all of these organizations who are working together to improve VRS.

Respectfully submitted,

/s/ electronically signed

Sharon A. Hayes
Director, VRSCA

APPENDIX

Summary of VRSCA Survey
Improving Service Levels for VRS
March and April 2015

The VRSCA survey on improving service levels for Video Relay Service (VRS) was taken during the following DeafNation Expo events:

- On March 21, 2015, in Orlando, Florida
- On March 28, 2015, in Austin, Texas
- On April 11, 2015, in Atlanta, Georgia

VRSCA had a booth at each DeafNation Expo, open between the hours of 9:00 a.m. to 5:00 p.m., with 3 people working at the booth. There were 7 questions on the survey for consumers who use VRS. If consumers did not understand the questions and asked for them to be signed in American Sign Language (ASL), one of the people working the booth signed the questions.

There were 460 consumers who responded to the survey, however, not all of the respondents answered every question. The consumers who responded to the survey were at least 18 years of age and ranged in age up to 90 years old. Figures obtained from DeafNation, Inc. indicate that more than 3,000 people attended each event.

The VRS consumers want improvements in the service levels for VRS, including improvements in the speed-of-answer, improvements in the quality of interpreting through skills-based routing and certified deaf interpreters, and improvements in interoperability.

Attached please find the 7 questions asked in the survey, followed by the survey results displayed in tables, bar graphs, and pie charts.

Consumer Survey: Improving Service Levels for VRS
March and April 2015

Using the five-point scale below, please rate the following issues. Please circle the number that best represents your opinion.

1 - No impact 2 - little impact 3 - moderate impact 4 - much impact 5 - strong impact

1) **Skill-based routing.** What impact do you think skill-based routing of VRS calls would have? ("Skill-based" means you could get interpreters certified in different specialties, such as a medically-certified interpreter for medical calls.) Please circle one answer.

1 - No impact 2 - little impact 3 - moderate impact 4 - much impact 5 - strong impact

2) **Video quality.** What impact would there be if the video quality of VRS was improved? Please circle one answer.

1 - No impact 2 - little impact 3 - moderate impact 4 - much impact 5 - strong impact

3) **Speed-of-answer.** What impact would reducing the current 120-seconds required speed-of-answer to 60 seconds have on your experience with VRS? Please circle one answer.

1 - No impact 2 - little impact 3 - moderate impact 4 - much impact 5 - strong impact

4) **Off-the-shelf equipment.** How much of a financial impact would there be on your budget if you were required to purchase your own VRS equipment? Please circle one answer.

1 - No impact 2 - little impact 3 - moderate impact 4 - much impact 5 - strong impact

5) **Choice in providers.** Two years ago, there were four IP Relay providers. Today, there is only one. What impact would it have on you if you had no choice in VRS providers because there was only one remaining provider? Please circle one answer.

1 - No impact 2 - little impact 3 - moderate impact 4 - much impact 5 - strong impact

6) **Deaf interpreters.** What impact would there be if deaf interpreters could assist with complicated calls or be requested when communication between deaf callers and interpreters wasn't going well? Please circle one answer.

1 - No impact 2 - little impact 3 - moderate impact 4 - much impact 5 - strong impact

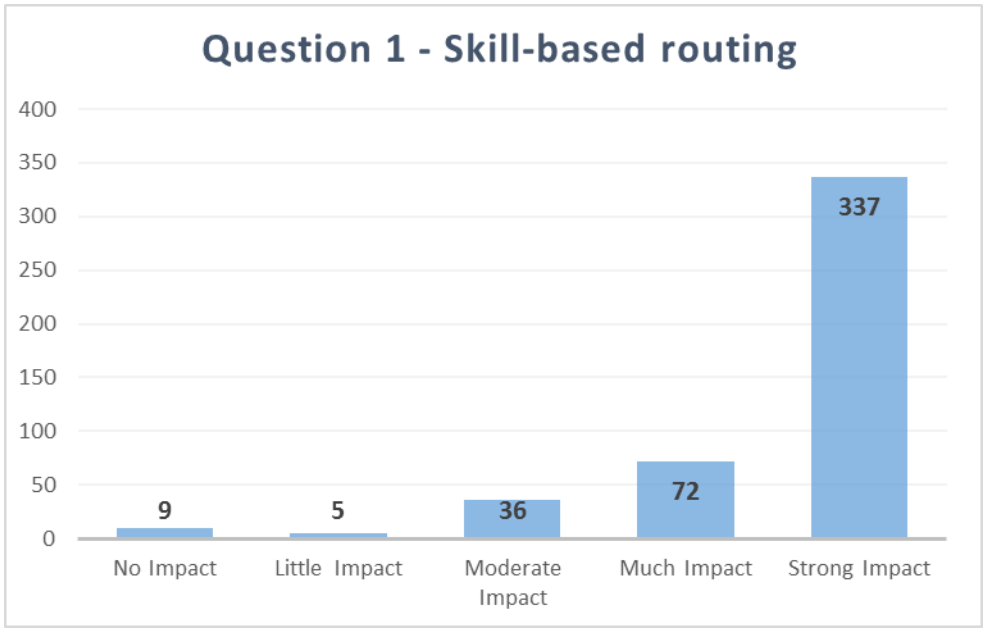
7) **Point-to-point interoperability.** What impact would solving interoperability problems between various VRS providers' equipment have (meaning you could call anyone regardless of their provider)? Please circle one answer.

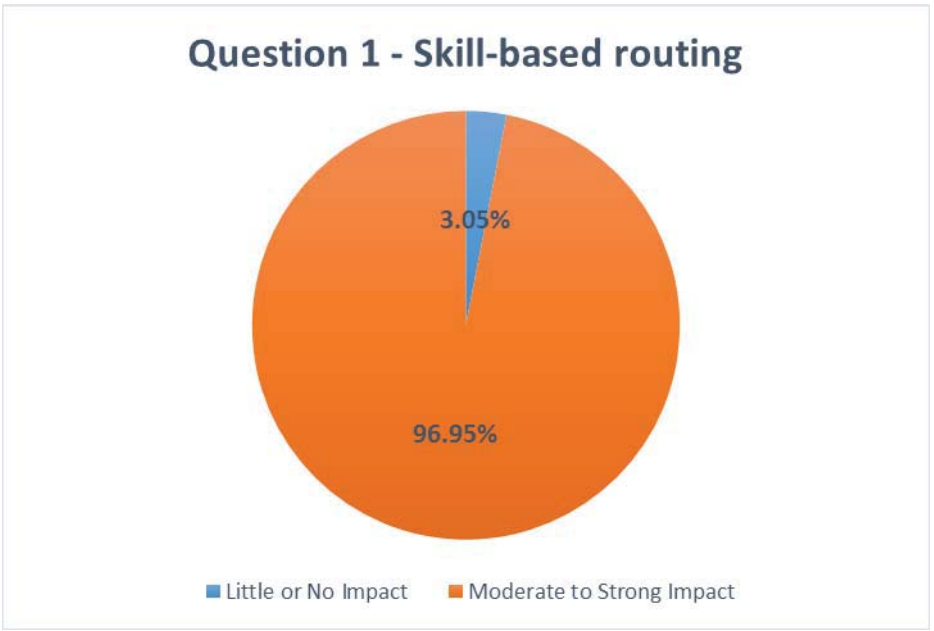
1 - No impact 2 - little impact 3 - moderate impact 4 - much impact 5 - strong impact

Question 1 Skill-based routing

	# of Respondents	% of Total
No Impact	9	1.96%
Little Impact	5	1.09%
Moderate Impact	36	7.84%
Much Impact	72	15.69%
Strong Impact	337	73.42%
Total Respondents	459	100.00%

	# of Respondents	% of Total
Little or No Impact	14	3.05%
Moderate to Strong Impact	445	96.95%
Total Respondents	459	100.00%

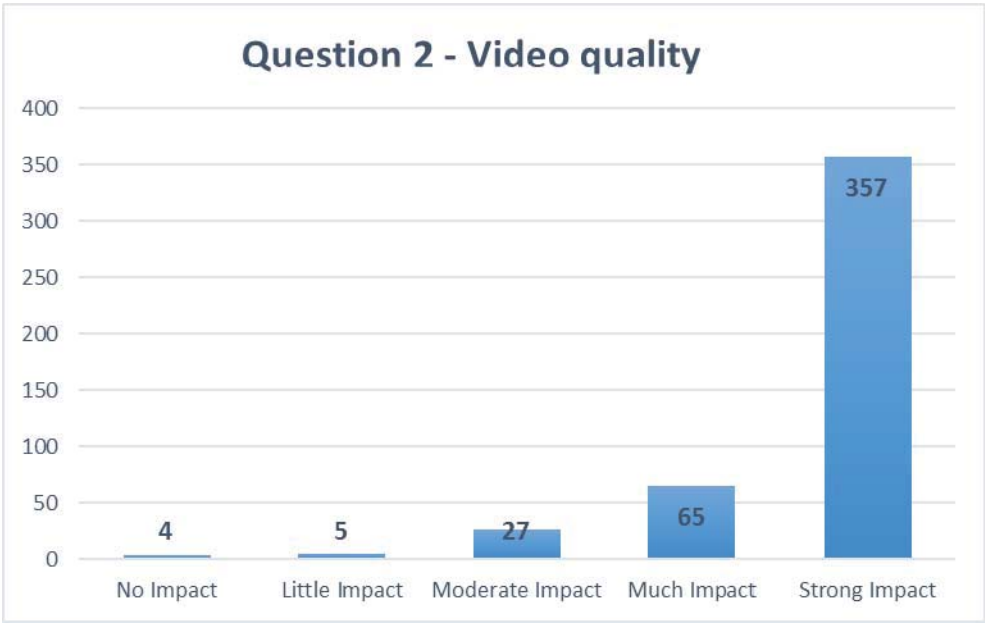




Question 2 Video quality

	# of Respondents	% of Total
No Impact	4	0.87%
Little Impact	5	1.10%
Moderate Impact	27	5.90%
Much Impact	65	14.19%
Strong Impact	357	77.94%
Total Respondents	458	100.00%

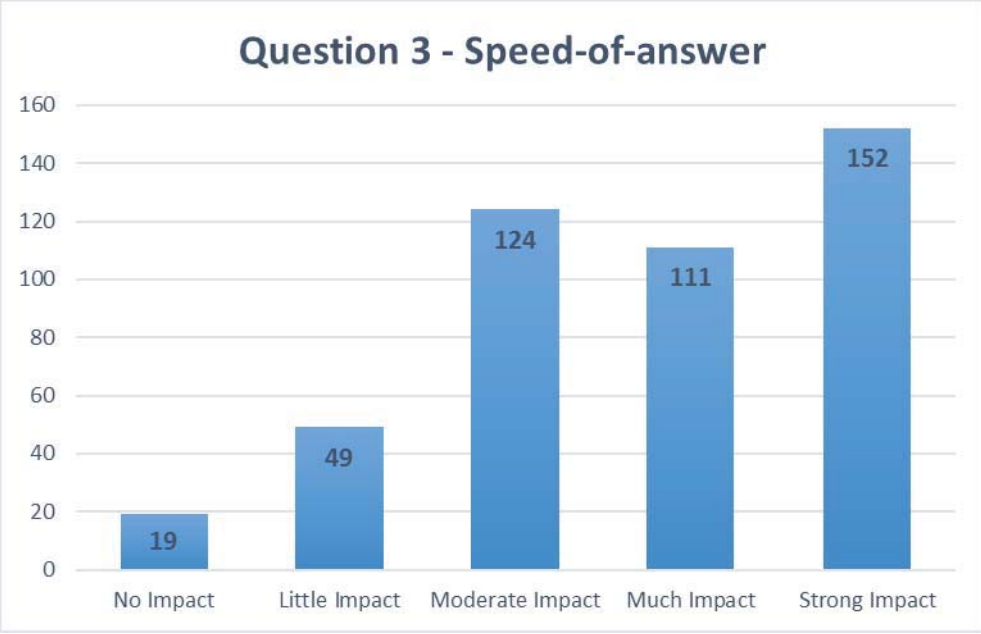
	# of Respondents	% of Total
Little or No Impact	9	1.97%
Moderate to Strong Impact	449	98.03%
Total Respondents	458	100.00%

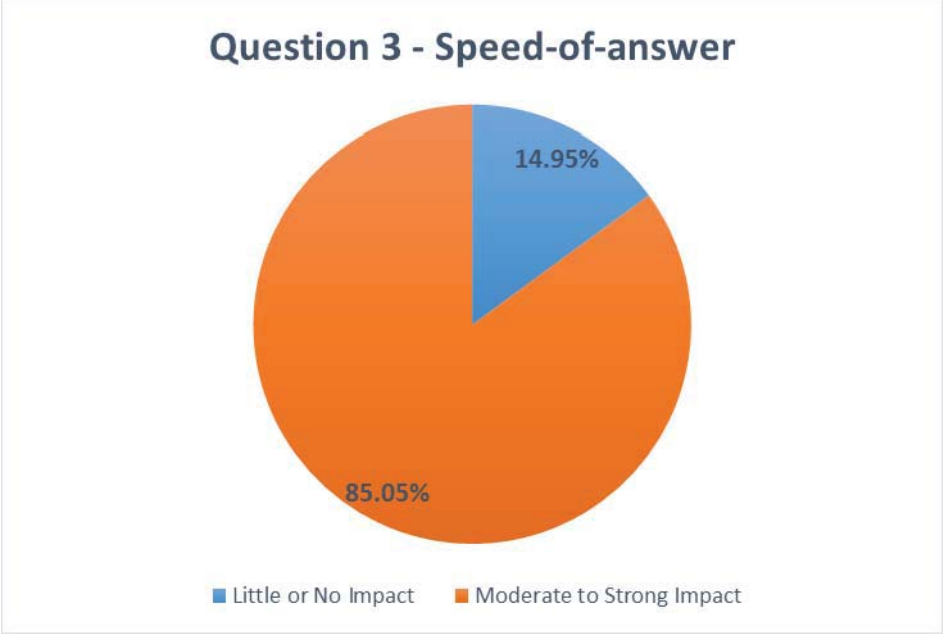


Question 3 Speed-of-answer

	# of Respondents	% of Total
No Impact	19	4.18%
Little Impact	49	10.77%
Moderate Impact	124	27.25%
Much Impact	111	24.40%
Strong Impact	152	33.40%
Total Respondents	455	100.00%

	# of Respondents	% of Total
Little or No Impact	68	14.95%
Moderate to Strong Impact	387	85.05%
Total Respondents	455	100.00%

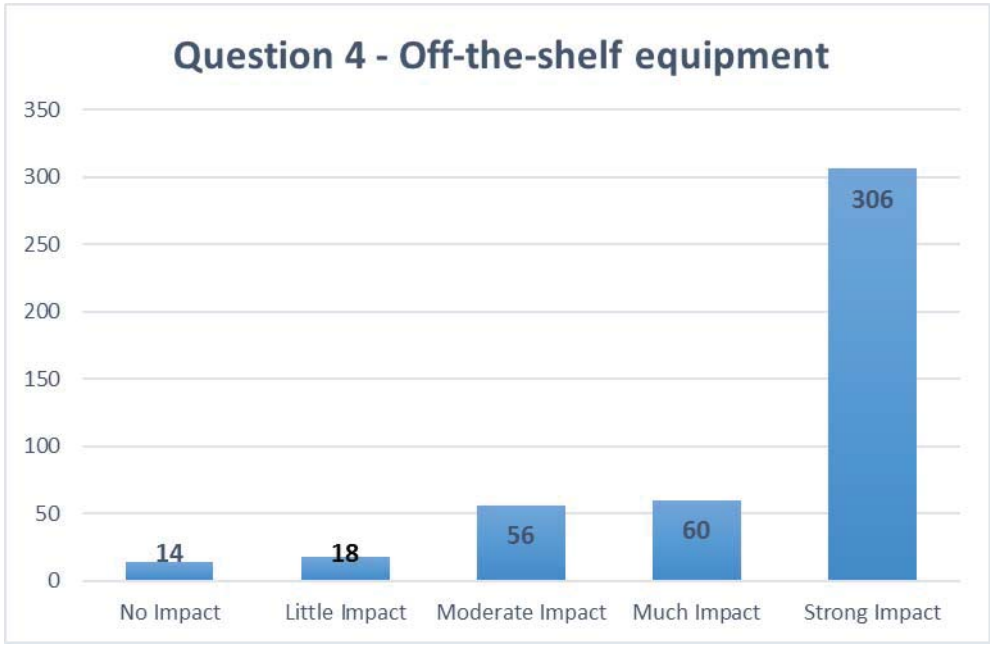


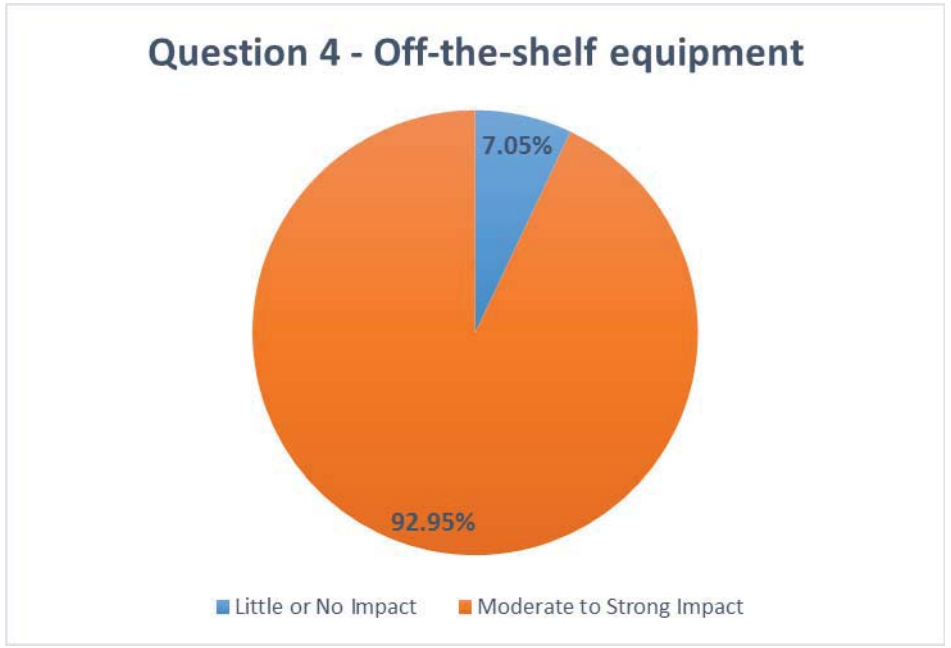


Question 4 Off-the-shelf equipment

	# of Respondents	% of Total
No Impact	14	3.08%
Little Impact	18	3.97%
Moderate Impact	56	12.33%
Much Impact	60	13.22%
Strong Impact	306	67.40%
Total Respondents	454	100.00%

	# of Respondents	% of Total
Little or No Impact	32	7.05%
Moderate to Strong Impact	422	92.95%
Total Respondents	454	100.00%

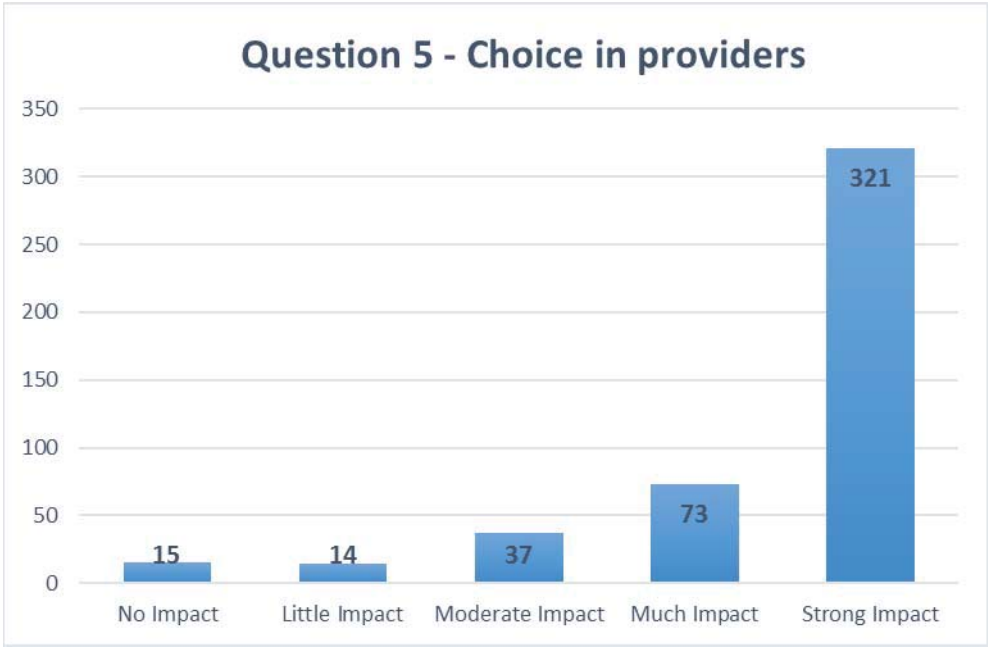


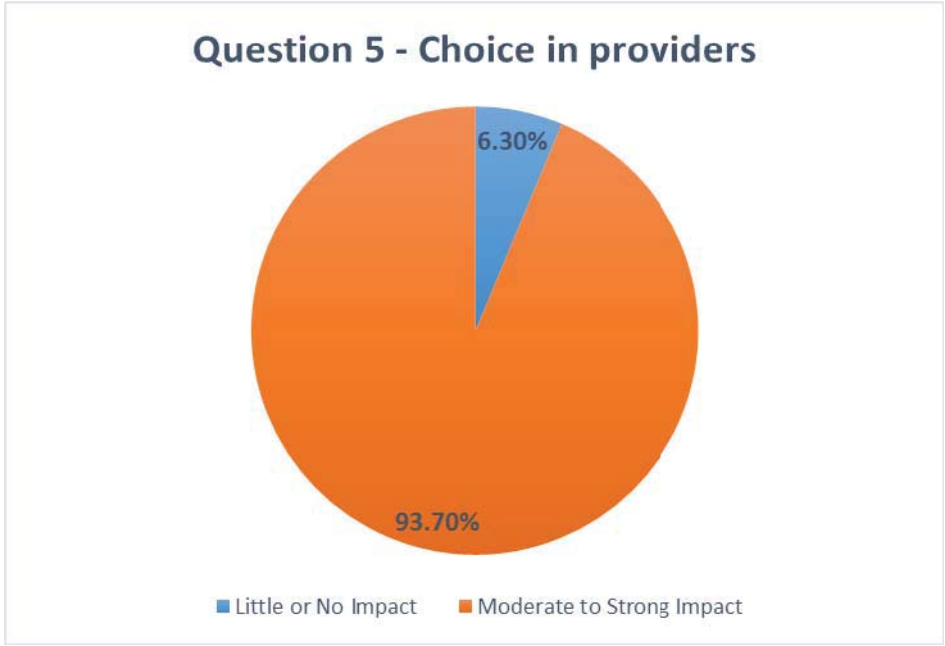


Question 5 Choice in providers

	# of Respondents	% of Total
No Impact	15	3.26%
Little Impact	14	3.04%
Moderate Impact	37	8.04%
Much Impact	73	15.87%
Strong Impact	321	69.79%
Total Respondents	460	100.00%

	# of Respondents	% of Total
Little or No Impact	29	6.30%
Moderate to Strong Impact	431	93.70%
Total Respondents	460	100.00%

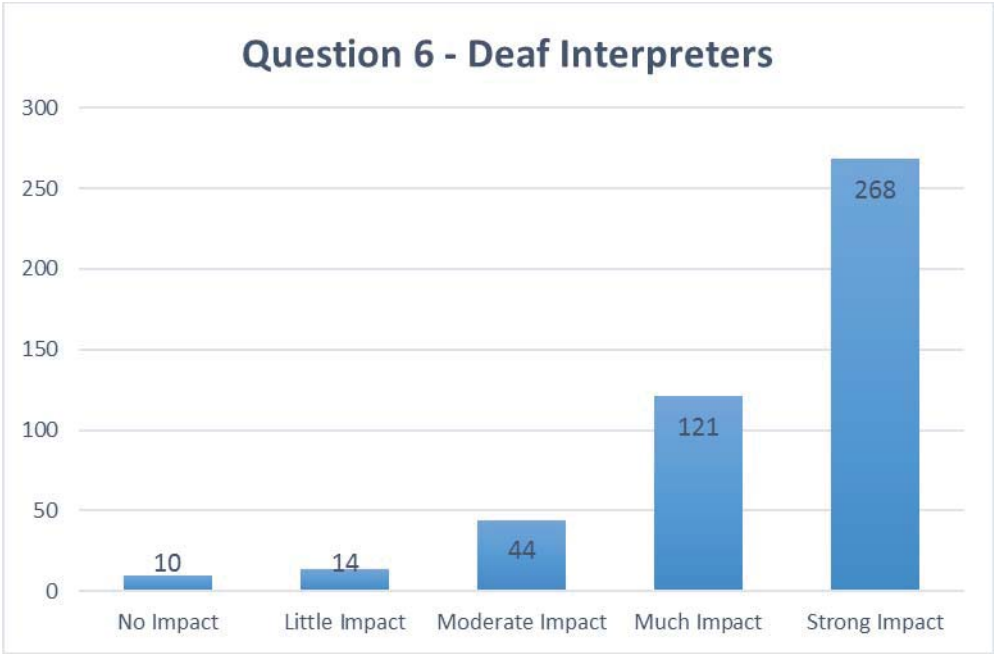


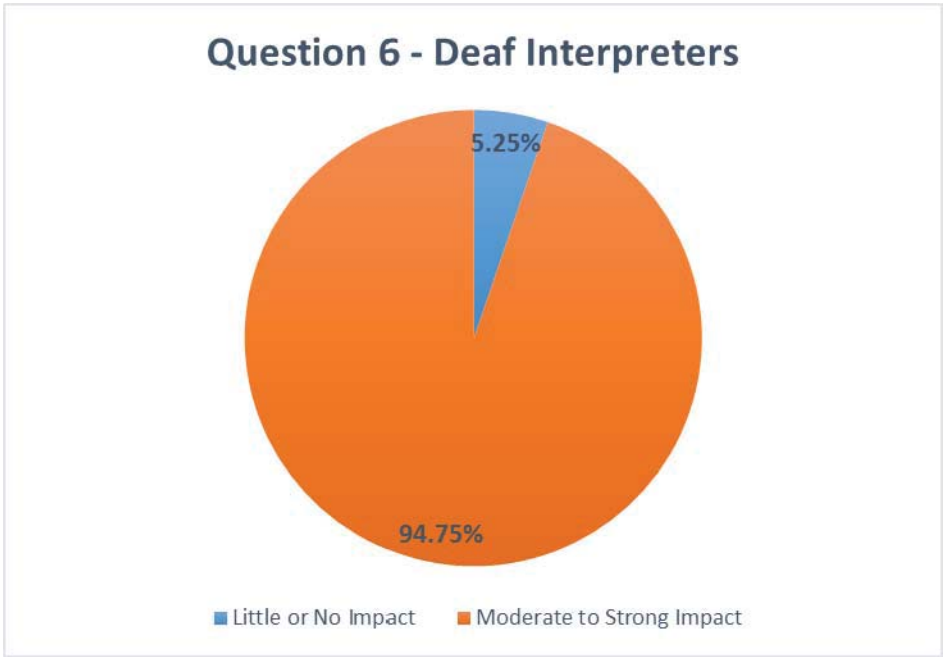


Question 6 Deaf Interpreters

	# of Respondents	% of Total
No Impact	10	2.19%
Little Impact	14	3.06%
Moderate Impact	44	9.63%
Much Impact	121	26.48%
Strong Impact	268	58.64%
Total Respondents	457	100.00%

	# of Respondents	% of Total
Little or No Impact	24	5.25%
Moderate to Strong Impact	433	94.75%
Total Respondents	457	100.00%





Question 7 Point-to-point interoperability

	# of Respondents	% of Total
No Impact	3	0.66%
Little Impact	8	1.75%
Moderate Impact	30	6.58%
Much Impact	56	12.28%
Strong Impact	359	78.73%
Total Respondents	456	100.00%

	# of Respondents	% of Total
Little or No Impact	11	2.41%
Moderate to Strong Impact	445	97.59%
Total Respondents	456	100.00%